

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH DAKOTA  
WESTERN DIVISION

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UNITED STATES OF AMERICA,

CR 24-50168-04

Plaintiff,

FACTUAL BASIS STATEMENT

vs.

TURNER HEINBAUGH,

Defendant.

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The Defendant states the following facts are true, and the parties agree they establish a factual basis for the offense to which the Defendant is pleading guilty pursuant to Fed. R. Crim. P. 11(b)(3).

My name is: Turner Heinbaugh.

Beginning on an unknown date and continuing to on or about November of 2024, in the District of South Dakota and elsewhere, two or more persons did knowingly and intentionally combine, conspire, confederate, and agree together, with others known and unknown, to knowingly conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, to wit: conducting wire and money transfers at financial institutions and using apps to transfer money, which involved the proceeds of a specified unlawful activity, that is, conspiracy to distribute a controlled substance, knowing that the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of said specified

unlawful activity, and that while conducting and attempting to conduct such financial transactions knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity.

I voluntarily and intentionally joined in the agreement or understanding to conduct and attempt to conduct financial transactions affecting interstate and foreign commerce in or about 2024, while it was still in effect.

During my involvement in the conspiracy, co-conspirators provided me with money. I then sent the money to individuals that my co-conspirators instructed me to, including to individuals in Mexico. I utilized financial institutions including Walmart, Western Union, and Cash App to receive money from my co-conspirators and/or to send money to other co-conspirators. I knew that the funds involved in these transactions were derived from the sale of illegal narcotics, specifically methamphetamine. The purpose of these transactions was to conceal the fact that the money was derived from the sale of methamphetamine and the ownership of the funds.

My involvement with the conspiracy ended when I was arrested on November 22, 2024.

My conduct was all in violation of 18 U.S.C. §§1956(h) and 1956(a)(1)(B)(i).

The parties submit that the foregoing statement of facts is not intended to be a complete description of the offense or the Defendant's involvement in it. Instead, the statement is offered for the limited purpose of satisfying the requirements of Fed. R. Crim. P. 11(b)(3). The parties understand that additional

information relevant to sentencing may be developed and attributed to the Defendant for sentencing purposes.

ALISON J. RAMSDELL  
United States Attorney

April 14, 2025

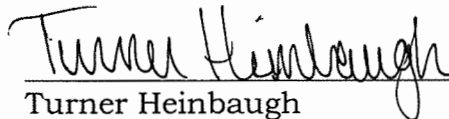
Date



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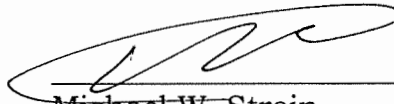
Date



Turner Heinbaugh  
Defendant

3/27/25

Date



Michael W. Strain  
Attorney for Defendant